

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER

SECOND AMENDED NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

**TO: Eric Abraham, Esq.
Hill Wallack LLP
21 Roszel Road
Princeton, New Jersey 08540**

*Attorneys for Defendants Hetero Labs Limited and Hetero Drugs, Limited (hereinafter
"Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Dr. Manoranjan Kumar, Senior Vice President, Corporate Quality Assurance, on May 26 and 28, 2021, at 8:00 a.m. pacific time, and continuing until completion, at Hill Wallack LLP, 21 Roszel Road, Princeton, New Jersey 08540, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

Dated: May 21, 2021

By: /s/ Andrés Rivero
ANDRÉS RIVERO
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*Counsel for MSP Recovery Claims,
Series LLC*

EXHIBIT A

30(B)(6) TOPICS

Testing

6. The testing performed by HLL or its agents, to evaluate the purity and contents of HLL's API.
10. The chromatogram and mass spectrometry results for all testing by HLL or its agents of HLL's valsartan API.
15. The chromatogram and mass spectrometry results for all testing by HLL or its agents of the solvents utilized in the manufacture of HLL's valsartan API.

Quality Assurance and Quality Control Activities

20. HLL's SOPs/policies/procedures intended to prevent, detect, or act in response to any carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, in connection with the manufacture and contents of HLL's valsartan API.
22. HLL's application of cGMPs intended to prevent, detect, or act in response to any carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, in connection with the manufacture and contents of HLL's valsartan API.
24. HLL's SOPs/policies/procedures for determining when it is appropriate to conduct a genotoxic analysis of the process associated with API manufacturing.

Compliance with cGMPs

41. HLL's compliance or non-compliance with cGMPs intended to prevent, detect, or act in response to any carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, as it relates to the manufacture, quality assurance, quality control, and sale of HLL's valsartan API.
43. The policies, practices, procedures and trainings for monitoring compliance with cGMPs intended to prevent, detect, or act in response to any carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, in the manufacture, quality assurance, quality control, and sale of HLL's valsartan API.

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Dr. Manoranjan Kumar.
2. The complete production of Dr. Manoranjan Kumar's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2021 I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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